

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In Re:

HANJIN SHIPPING CO., LTD.,

Debtor.

U.S. BANKRUPTCY COURT
FILED
NEWARK, NJ

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JAMES J. WALDRON

BY: 
DEPUTY CLERK

Chapter 15
Case No.: 16-27041-JKS
Hon. John K. Sherwood

Hearing Date: September 9, 2016
Hearing Time: 10 AM

**OMNIBUS JOINDER OF FOREVER 21, INC. IN OBJECTIONS
TO FOREIGN REPRESENTATIVE'S MOTION FOR ENTRY OF
PROVISIONAL AND FINAL ORDERS GRANTING RECOGNITION OF
FOREIGN MAIN PROCEEDING AND CERTAIN RELATED RELIEF**

TO THE HONORABLE JOHN K. SHERWOOD,
UNITED STATES BANKRUPTCY JUDGE:

Forever 21, Inc. ("Forever 21"), by and through undersigned counsel, hereby joins in the objections filed by other beneficial cargo owners (collectively, the "Objections"), including the objections filed by HP, Inc., Samsung Electronics Co., Ltd., Ashley Furniture Industries Inc., and Dorel Industries, Inc., in response to the *Motion of Foreign Representative for Entry of Provisional and Final Orders Granting Recognition of Foreign Main Proceeding and Certain Related Relief Pursuant to Sections 362, 365, 1517, 1519, 1520, 1521 and 105(a) of the Bankruptcy Code* [Dkt. No. 5] (the "Motion"), and respectfully states as follows:

1. The Objections describe the predicament facing numerous beneficial owners of cargo carried by Hanjin Shipping Co. Ltd. (the “Debtor”), which are suffering substantial injuries as a result of the continuing disruption and uncertainty wrought initially by the Debtor’s bankruptcy filing in South Korea and then deferred by this Court’s *Interim Provisional Order Granting Recognition of Foreign Main Proceeding and Certain Related Relief Pursuant to Sections 362, 365, 1517, 1519, 1520, 1521, and 105(a) of Bankruptcy Code* [D.I. 22] (the “Interim Order”) until the hearing to be held on Friday, September 9, 2016.

2. As one such beneficial cargo owner, Forever 21 shares the concerns raised in the Objections, and specifically joins in the arguments made by fellow objecting cargo owners with respect to the need for and appropriateness of an order (a) invalidating Rule B attachments obtained after commencement of the Debtor’s Korean insolvency proceeding, (b) enabling cargo owners to make their own arrangements to obtain their cargo and return empty containers without having to pay the Debtor or the Foreign Representative for charges the cargo owners may be forced to pay directly to non-debtor parties, and (c) requiring the Debtor or the Foreign Representative to produce shipping manifests forthwith so that cargo owners can coordinate with each other where they have cargo on the same ship.

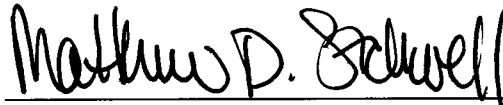
3. Forever 21 hereby reserves its rights to supplement this joinder as other parties in interest file additional objections to the Motion (or as information is made available by the Debtor or the Foreign Representative), and to object on all available grounds to any additional or modified procedures that the Debtor or the Foreign Representative may propose.

4. Notice of this joinder is being served on (a) the Office of the United States Trustee; (b) counsel for the Foreign Representative; and (c) those parties that have requested notice in this case.

WHEREFORE, Forever 21 respectfully requests that the Court (a) modify the Interim Order to apply the automatic stay in its normal manner to maritime lienholders, and to permit vessels to enter and exit U.S. ports without fear of arrest, (b) modify the Interim Order to enable cargo owners and third parties to make their own arrangements facilitating the delivery of cargo as proposed in certain of the Objections, and (c) grant such other and further relief as may be just and proper.

DATED: September 8, 2016

Respectfully submitted,

A handwritten signature in black ink, reading "Matthew D. Stockwell". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Matthew D. Stockwell

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